

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:	James H Call)	
	Terrie M. Call)	Case No. 13-30686-KRH
	Debtors.)	Chapter 13
)	
Address	10803 Timber Run Rd.)	
	Chesterfield, VA 23832)	
)	
	Last four digits of SSN or ITIN:)	
	4205)	
	0745)	
)	

NOTICE OF MOTION TO RECONSIDER ORDER GRANTING RELIEF

Jason M. Krumbein, Esq. has filed papers with this court seeking reconsideration of the Order Granting Relief (docket #85).

Your rights may be affected. You should read these papers carefully, and discuss them with your attorney in this Bankruptcy Case, if you have one. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before 21 DAYS FROM TODAY, you or your attorney must:

File with the court and mail a copy to the Debtors' counsel, at the addresses shown below, a written request for a hearing. If you mail your request for hearing to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of the Court	Richard J. Oulton, Esq.
U.S. Bankruptcy Court	America Law Group
701 E. Broad St., Suite 4000	8501 Mayland Dr. Ste 106
Richmond, VA 23219	Henrico VA 23294

You must also attend a hearing to be scheduled March 9, 2016 at 11:00 am, before Judge Huennnekens, 701 E. Broad St. Rm 5000, Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion, and may enter an order granting that relief.

Date: February 3, 2016

/s/ Richard J. Oulton Esq.
8501 Mayland Dr. Suite 106
Henrico, VA 23294
VSBN 29640
Counsel for Debtor in Bankruptcy

CERTIFICATE OF SERVICE
See certification in Application Attached hereto

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MOTION TO RECONSIDER ORDER ON MOTION FOR RELIEF

COMES NOW, Richard J. Oulton., counsel for Debtor(s), and pursuant to FRBP 9024 and FCRP 60 (b) and says as follows:

- 1) This motion is filed pursuant to Fed.R.Bankr.Proc.9024, and Fed.R.Civ.Proc. 60(b).

JURISDICTION, VENUE, CORE PROCEEDING

- 2) This court has jurisdiction pursuant to 28 USC 1441.
- 3) This is the proper venue pursuant 28 USC 1391.
- 4) This is a core proceeding pursuant to 28 USC 157.

PARTIES

- 5) The movants are the Debtors in the above identified case, as defined by the Bankruptcy Code.
- 6) Respondents are creditors as defined by the Bankruptcy code.

FACTS

- 7) Movants filed a Voluntary Petition for Relief in this court on 2/11/2013.
- 8) Movants Chapter 13 plan is active and in good standing.

- 9) CitiFinancial filed a motion for relief on 5.1.2015.
- 10) The motion for relief was resolved by consent order on 8/17/2015, which called for standard terms, including a Notice of Default and a related Certification of said default that the Notice of Default had not been cured or objected to.
- 11) Respondent filed a Notice of Default on 12/2/2015.
- 12) Movant cured the default by payment on 12/16/2015., and sent a copy of the money order for payment by e-mail.
- 13) Respondent filed a certification on 1/19/2016 that the default had not been cured. This was a false representation.
- 14) Subsequently, the court entered an order granting relief from the stay on 1/27/2016.
- 15) Movant has made all of the payments required under the order as of the date of this motion.

RELIEF REQUESTED

Movants request that the court grant the motion to reconsider the order granting relief for the reasons stated above.

/s/ Richard J. Oulton, Esq.
Richard J Oulton, Esq. VSBN29640
Counsel for the Debtor(s) in Bankruptcy
America Law Group
8501 Mayland Dr. Suite 106
Henrico, VA 23832
Tel: 804.308.0051 Fax: 804.308.0053
2debtlawgroup@gmail.com

CERTIFICATE OF SERVICE

I certify that I have this February 3, 2016, transmitted a true copy of the foregoing application electronically through the court's CM/ECF system to the Chapter 13 Trustee and US

Trustee, and counsel for CitiFinanial and by regular mail to the to the Debtor and all creditors listed on the attached Service List.

NO OTHER CREDITORS AFFECTED

/s/ Richard J Oulton, Esq.
Counsel for the Debtor(s) in Bankruptcy



4605 Commerce Rd
Richmond VA 23234
1.800.796.2328 www.callfcu.org

PAY SIX THOUSAND EIGHT HUNDRED ONE AND 90/100 DOLLARS-----

TO CITIFINANCIAL SERVICING LLC
THE RE: JAMES H CALL
ORDER OF

Memo _____

DATE
12/16/2015
AMOUNT
\$*****6,801.90

Rosie Sall

AUTHORIZED SIGNATURE

11 238 58 711



TELLER CHECK WRITER

Mbr Number: ***08 Teller: 25 BR: 000 Date: 12/16/15
 Mbr Name: JAMES H CALL Txn: 878 Time: 11:11:37 CAN: 646
 Pay to: CITIFINANCIAL SERVICING LLC
 Check Number: 238587

Checks Disbursed: \$6,801.90

Transactions Posted	Account	Txn Amount	Ending Balance
FROM ACCT TYPE - MULT CHECKS		\$6,801.90-	

ASK ME HOW CFCU CAN SAVE YOU MONEY !